



## Emergency Support Services

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January 22, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

**Re: GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum  
Between 3.7 and 24 GHz*  
ET Docket No. 18-295, *Unlicensed Use of the 6 GHz Band*  
*Ex Parte* Communication**

Dear Ms. Dortch:

I am filing this letter on behalf of St. Croix County, Wisconsin, and its county and municipal public-safety providers, including thirty-seven (37) Law Enforcement, Fire, and Emergency Medical Services (EMS) agencies that are dispatched by the County's Public Safety Answering Point (PSAP). Overall, our department is responsible for providing reliable two-way, and one-way radio paging supporting more than 1,400 mobile/portable units.

- St. Croix County currently owns seven (7) 6GHz links as part of a recently completed multi-million dollar microwave-linked fourteen (14) site comprehensive simulcast two-way radio system. These critical links are used for the transmission of multiple VHF radio transmissions, other public-utility UHF transmissions, and backup availability for emergency 9-1-1 circuits.
- The proposal before the Federal Communications Commission (FCC) depends substantially on voluntary compliance in a (backhaul) industry that is not well understood by many who would seek to quickly deploy unlicensed connectivity solutions as suggested in the notice of proposed rulemaking. Inadvertent interference could significantly compromise reliability of St. Croix County's voice radio infrastructure because inter-site transport is fundamental to the network design and reliability of voice communications with our users. System interference or unavailability would seriously jeopardize public-safety as volunteer fire and EMS personnel would either not be able to receive radio pages or would receive low grade (radio page) transmissions. In addition, law enforcement would also have difficulty communicating with the County PSAP in emergency situations.

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- St. Croix County urges the FCC to maintain the proposal for the Automatic Frequency Control (AFC) for all unlicensed devices in bands 5925-6425 MHz and 6525-6875 MHz. The County suggests the FCC look at the analysis by the Fixed Wireless Communications Commission that proves that AFC is needed regardless of the power level or location of the unlicensed device. Furthermore, any proposal should require the manufacturers to prevent AFC from being disabled by the user. St. Croix County believes that even with AFC, the potential for interference still exists while the AFC manages the unlicensed radio's behavior.
- St. Croix County also urges the FCC to ensure that the database used for the AFC system is accurate and up-to-date before unlicensed devices are installed.
- St. Croix County also urges the FCC to carefully review the data provided by the Fixed Wireless Communications Commission on the need to ensure that fixed link adjacent channels are fully protected.

Thank you for your time and consideration in this matter of utmost importance.

Respectfully submitted,



Stephen J. T'Kach  
Director